## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

STATES OF NEW YORK,
MASSACHUSETTS, WASHINGTON,
CONNECTICUT, DELAWARE, DISTRICT
OF COLUMBIA, HAWAII, ILLINOIS,
IOWA, NEW MEXICO, NORTH
CAROLINA, OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as President of the United States; U.S. DEPARTMENT OF HOMELAND SECURITY; ELAINE C. DUKE, in her official capacity; U.S. CITIZENSHIP AND IMMIGRATION SERVICES; U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; and the UNITED STATES OF AMERICA,

Defendants.

State of New York County of Kings AFFIDAVIT OF **SCOTT KAPLAN**IN SUPPORT OF MOTION TO
ADMIT COUNSEL *PRO HAC VICE*17-CV-5228

SCOTT KAPLAN, being duly sworn, hereby deposes and says as follows:

- 1. I am a Senior Assistant Attorney General with the Oregon Department of Justice.
- 2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above captioned matter.
- 3. As shown in the Certificate of Good Standing annexed hereto I am a member in good standing of the Bar of the States of Oregon, Washington, and California (inactive).
- 4. There are no pending disciplinary proceedings against me in any State or Federal Court.
- 5. I have not been convicted of a felony.
- 6. I have not been censured, suspended, disbarred or denied admission or readmission by any court.

7. Wherefore your affiant respectfully submits that he be permitted to appear as counsel and advocate *pro hac vice* in this one case for Plaintiff State of Oregon.

Dated: November 13, 2017

Signature of Movant

Firm Name: Oregon Department of Justice

Address: 100 SW Market Street Portland, OR 97201

Email: scott.kaplan@doj.state.or.us

Phone: (971) 673-1880